

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

MERHDAD FOTOOHIGHIAM

Plaintiff,

v.

Case No: 24-cv-04182-MDH

THE CITY OF COLUMBIA, MISSOURI,
et al.,

Defendants.

**PLAINTIFF MEHRDAD FOTOOHIGHIAM'S CONSENT MOTION FOR EXTENSION
OF TIME TO FILE A RESPONSE TO THE BOONE COUNTY DEFENDANTS'
MOTION TO DISMISS (DOCS. 64-65)**

NOW COMES, Plaintiff Mehrdad Fotoohigham, by and through undersigned counsel, and for his Consent Motion for Extension of Time to respond to Defendants' Boone County, Missouri, Boone County Prosecutors Office, Boone County Sheriff's Department, Prosecutors Roger Johnson and Phillip Groenweghe, Boone County Jail, Dwayne Carey, Anthony Perkins, Jennifer Atwell, Matt Vessar, and David Wilson ("Boone County Defendants") Motion to Dismiss (Docs. 64-65), states as follows:

Plaintiff moves to extend the time in which to file Plaintiff's response to the Boone County Defendants' Motion to Dismiss from March 28, 2025, to April 28, 2025. Defendants do not object to Plaintiffs' motion.

1. On March 14, 2025, the Boone County Defendants' filed a Motion to Dismiss Plaintiff's Complaint.

2. Plaintiffs' counsel conferred with the Boone County Defendants' counsel, and the parties agree to extend Plaintiffs' deadline to answer the Boone County Defendants' Motion to Dismiss up to and including April 28, 2025.

3. This request is not made in bad faith or to cause undue delay.

4. Accordingly, Plaintiff respectfully request that his response to the Boone County Defendants' Motion to Dismiss deadline be extended such that, their response for must be filed no later than **April 28, 2025**.

WHEREFORE, Plaintiff Mehrdad Fotoohighiam respectfully requests that this Court enter an Order granting his Motion for Extension of Time and grant an extension of time until and including April 28, 2025, for filing Plaintiffs' response to Boone County Defendants' Motion to Dismiss.

Date: March 28, 2025

Respectfully submitted,

/s/Ahmad Zaher
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**ATTORNEYS FOR
MERHDAD FOTOOHIGHIAM**

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Ahmad Zaher